

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS HARAHUSH TO QUESTION OF
UNITED PARCEL SERVICE POSED AT HEARING
(May 17, 2000)

The United States Postal Service hereby provides the response of witness Harahush to the question posed by UPS counsel at Tr. 16/6675-76.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Richard T. Cooper

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Washington, D.C. 20260-1137
May 17, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO QUESTION
POSED BY UPS DURING HEARINGS**

Question of UPS at Tr. 16/6675 – 6676:

Q Now, Table 5 is called "Letters, Rural Carrier Street Costs, FY 1998, Proportions of Mail Volume Used for Cost Distributions." And Table 6 is entitled "Flats, Rural Carrier Street Costs, FY 1998, Proportions of Mail Volume Used for Cost Distributions." Unlike in the case of your tables for the city carrier costs, you do not include a table for parcels similar to Tables 5 and 6. . . .

Can you produce that table and would you do so?

RESPONSE:

The requested table is attached.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS HARAHUSH TO QUESTION
POSED BY UPS DURING HEARINGS

PARCELS - RURAL CARRIER COST - FY 1998
PROPORTIONS OF MAIL VOLUME

Mail Class	Proportion of Mail	C.V. of ¹ Proportion (Percent)	Lower 95% Confidence Limit ²	Upper 95% Confidence Limit ²
First-Class Mail:				
Letters & Parcels	0.1262	2.25	0.1206	0.1318
Presort Letters & pcl	0.0045	43.55	0.0006	0.0084
Private mailing cards				
Presort private cards				
Total First-Class	0.1308	2.51	0.1243	0.1372
Priority Mail	0.2047	1.37	0.1991	0.2102
Mailgrams				
Periodicals	0.0190	4.86	0.0172	0.0208
Standard A Mail:				
Single-Piece rate	0.0047	8.81	0.0039	0.0055
Regular Standard A				
Enhanced Carrier Rt				
Other	0.3164	1.42	0.3076	0.3252
Total Regular	0.3164	1.42	0.3076	0.3252
Nonprofit Standard A				
Enhanced Carrier Rt				
Other	0.0178	18.73	0.0112	0.0244
Total Nonprofit	0.0178	18.73	0.0112	0.0244
Total Standard A	0.3389	1.46	0.3292	0.3486
Standard B Mail:				
Parcel Post	0.1304	1.55	0.1264	0.1344
Special Standard	0.0420	3.18	0.0394	0.0446
Library Rate	0.0049	7.54	0.0042	0.0057
Bound Printed Matter	0.1189	3.54	0.1106	0.1272
Total Standard B	0.2962	1.69	0.2864	0.3061
U.S. Postal Service	0.0004	27.48	0.0002	0.0007
Free for Blind & hndcp	0.0054	8.97	0.0045	0.0064
International Mail	0.0046	15.54	0.0032	0.0060
Total Mail	1			

¹ Coefficient of variation = 100%X(Est. Std. Dev./Est. Proportion)

² Lower Limit = Est. Proportion - (1.97 X Est. Std. Deviation)

Upper Limit = Est. Proportion + (1.97 X Est. Std. Deviation)

DECLARATION

I, Thomas W. Harahush, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information and belief.

Thomas W. Harahush
Thomas W. Harahush

Date: 5/17/00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

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